

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA,

v.

NO. 3:15-CV-2690

\$19,227.78 IN UNITED STATES
CURRENCY SEIZED FROM BANK OF
AMERICA, NA ACCOUNT NO. ENDING
IN 5205 IN THE NAME OF KHI
MEDICAL SOLUTIONS, INC., AND
\$954.70 IN UNITED STATES
CURRENCY SEIZED FROM BANK OF
AMERICA, NA ACCOUNT NO. ENDING
IN 5218 IN THE NAME OF KHI
MEDICAL SOLUTIONS, INC.

COMPLAINT FOR FORFEITURE

The United States of America files this complaint *in rem* against the defendant property, pursuant to 18 U.S.C. § 983(a)(3) and Supplemental Rule G(2) of the Federal Rules of Civil Procedure, and in support states:

I. JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction of this cause of action *in rem* by virtue of the provisions of 28 U.S.C. §§ 1345 and 1355(a), and *in rem* jurisdiction because of 28 U.S.C. § 1355(b). Venue is proper under 28 U.S.C. § 1355(b)(1) and 28 U.S.C. § 1395(b).

2. The statutory basis for this suit is 21 U.S.C. § 881(a)(6). Also applicable are

28 U.S.C. §§ 2461 and 2465, 18 U.S.C. § 983, and 28 U.S.C. Rule G, Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions (Supplemental Rules).

II. PARTIES AND POTENTIAL CLAIMANTS

3. Defendant is personal property that was seized by the Drug Enforcement Agency within the Northern District of Texas, more particularly described as:

a. \$19,227.78 in United States Currency seized on or about March 17, 2015 from Bank of America, N.A. account number ending in 5205 in the name of KHI Medical Solutions Inc.; and

b. \$954.70 in United States Currency seized on or about March 17, 2015 from Bank of America, N.A. account number ending in 5218 in the name of KHI Medical Solutions Inc..

4. This action *in rem* is filed in the United States District Court, pursuant to the provisions of 18 U.S.C. § 983(a)(3)(A), because a verified claim to the defendant property was submitted to DEA on May 22, 2015, by or on behalf of the following individual:

Muhammad Faridi
President and Director
KHI Medical Solutions, Inc.
9507 Laney Way
Sugar Land, Texas 77498

III. FACTS

5. As more fully set forth in the Verification Affidavit of DEA Special Agent Chris Woolbright, attached hereto and incorporated herein as Exhibit A, the defendant property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is property involved in, or traceable to property involved in, a violation of 18 U.S.C. §§ 1956 and/or 1957, and pursuant to 21 U.S.C. § 881(a)(6) because it was furnished or intended to be furnished by any person in exchange for a controlled substance in violation of 21 U.S.C. §§ 841 and/or 846; is the proceeds traceable to such an exchange; and/or was used or intended to be used to facilitate a violation of 21 U.S.C. §§ 841 and/or 846.

IV. RELIEF

WHEREFORE, the United States of America, requests that:

A. A warrant for the arrest of the defendant property issue as provided by Title 28, United States Code, Rule G(3)(b)(i) of the Supplemental Rules;

B. The defendant property be arrested by the DEA, as provided by Title 28, United States Code, Rule G(3)(c) of the Supplemental Rules;

C. Publication of notice of the Complaint For Forfeiture and warrant for arrest of property be made on the official internet government forfeiture site (www.forfeiture.gov) for at least 30 consecutive days in accordance with Title 28, United States Code, Rule G(4)(a)(iv)(C) of the Supplemental Rules;

D. All persons having any interest in or right against the defendant property be advised: (1) by said public notice as required by Title 28, United States Code, Rule

G(4)(a) of the Supplemental Rules; or (2) by direct notice on the known possible claimant(s) in paragraph IV, as required by Rule G(4)(b) of the Supplemental Rules, to timely file a verified claim identifying the interest or right to the defendant property in this Court as required by Rule G(5)(a) and 18 U.S.C. §983(a)(4)(A); and to file an answer to this Complaint for Forfeiture or motion under Federal Rule of Civil Procedure 12 in the manner required by the provisions of Rule G(5)(b) of the Supplemental Rules and 18 U.S.C. §983(a)(4)(B). Further any person filing a verified claim of interest or right and/or an answer shall serve a copy of same on Melissa A. Childs, Assistant United States Attorney, 1100 Commerce Street, Third Floor, Dallas, Texas 75242;

E. After all proceedings are had on this Complaint For Forfeiture, that the defendant property be condemned by judgment and order of this Court and declared and decreed to be forfeited to the United States of America according to law;

F. All costs and expenses incurred by the United States in obtaining the condemnation and forfeiture of the defendant property be appropriately taxed against any person or entity who may file a verified claim and answer herein, and/or if more than one person or entity files a verified claim and answer herein be jointly taxed and prorated among them, as the Court deems just and equitable; and

G. The United States have such other and further relief, at law or in equity, to which it may show itself justly entitled.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

/s/ Melissa A. Childs

MELISSA A. CHILDS

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